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October 5, 2022

VIA ECF

Honorable Jesse M. Furman, U.S.D.J. United States District Court Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007 Application GRANTED. The Clerk of Court is directed to terminate ECF No. 48.

SO ORDERED.

Optobor 6, 2022

Re: David Lopez v. Nelson Management Group, Ltd., et al.,

Case No. 1:21-cv-00865 (JMF)

Dear Judge Furman:

This firm represents the Defendants in the above-referenced action.

Pursuant to Sections 1.A and 1.E of Your Honor's Individual Rules and Practices, we respectfully seek a three-week extension of time for the parties to file their settlement agreement and joint submissions with the Court for fairness review pursuant to *Wolinsky v. Scholastic Inc.*, 900 F. Supp. 2d 332 (S.D.N.Y. 2012), from the current deadline of Thursday, October 6, until Thursday, October 27.

This is the first application for an extension of the submission deadline, directed by this Court in an Order entered September 22. *See* Dkt. No. 47. The parties have conferred and Plaintiff's counsel consents to the application. No other dates or deadlines would be affected by the request.

Defendants are currently reviewing draft settlement paperwork that would memorialize and give effect to the parties' agreement. While Defendants expect that any negotiations concerning the settlement paperwork will be quickly completed, the undersigned is out of the office the remainder of this week and all of the following week, returning Monday, October 17.

We thank the Court for its consideration of this request.

Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP

Attorneys for Defendants

By: S

Stephen P. Pischl

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cc: <u>VIA ECF</u>

ABDUL HASSAN LAW GROUP, PLLC Attorneys for the Plaintiffs